



Re: cafo timeline SOP 
Julianne Socha to: Heacock, Dan

07/31/2012 04:30 PM

Hi Dan,
The timeline for a complete application is fine .

Why does it take 45 days to review a response to the first NOI when the permit application review and issuance of the first NOI only takes 30 days? I recommend allowing only 30 days to determine if the response to the NOI is sufficient rather than 45 days. Please let me know if 30 days is not a reasonable amount of time to review a response and issue the second NOI.

I recommend creating a timeline for one NOI and a separate timeline for two NOI. The one NOI timeline assumes that a permit decision will be made in 180 days. The two NOI timeline should have two outcomes, the first outcome assumes that a complete application is received after the second NOI, PN occurs then, a final permit decision by day 255. Another outcome is a VN or referral to EPA. The PN and permit issuance days is difficult to predict for the VN or EPA referral outcome. It would be acceptable for the SOP to indicate that once a VN or referral occur the matter is considered an enforcement matter and will not follow this permit SOP until such time as a complete application is received through enforcement actions.

Also, under most circumstances, permit applications submitted to IEPA in response to EPA enforcement actions should only be sent one NOI. If the permittee is not completely responsive to the first NOI, EPA enforcement should be involved to pursue obtaining a complete permit application through the EPA administrative order that required a complete application to be submitted. This could be added as a footnote to the second NOI box on the timeline. The footnote could state something to the effect of "if permit application submitted in response to EPA enforcement action in lieu of a second NOI EPA should be contacted to determine best method of obtaining missing information."

If you would like to discuss these comments I will return to the office on Friday, August 3 and am available to discuss. If you don't have any questions regarding these comments please resubmit the entire SOP with the timelines and the above comments incorporated for EPA review.

Thanks,
julianne

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"Heacock, Dan"

Julianne: Attached is a timeline drafted for the SOP

07/18/2012 05:21:17 PM

From: "Heacock, Dan" <Dan.Heacock@Illinois.gov>
To: Julianne Socha/R5/USEPA/US@EPA,
Date: 07/18/2012 05:21 PM
Subject: cafo timeline SOP

Julianne:

Attached is a timeline drafted for the SOP.

Let me know if you have questions or we need to discuss.

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[attachment "CAFO Permit App Timeline SOP.xlsx" deleted by Julianne Socha/R5/USEPA/US]